

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**STIPULATION AND AGREED ORDER BY AND AMONG THE DEBTORS,  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,  
AND THE OFFICE OF THE UNITED STATES TRUSTEE REGARDING  
THE REDACTION OF CERTAIN PERSONALLY IDENTIFIABLE INFORMATION  
IN THE DEBTORS' SCHEDULES AND STATEMENTS**

This Stipulation and Agreed Order (the “**Stipulation and Order**”) is made and entered into by and among the debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, the Official Committee of Unsecured Creditors (the “**Committee**”), and the Office of the United States Trustee (the “**U.S. Trustee**,” and together with the Debtors and the Committee, the “**Parties**”). The Parties hereby stipulate and agree as follows:

**RECITALS**

WHEREAS, on January 20, 2023, the Debtors filed *The Debtors’ Motion for Entry of Interim and Final Orders Waiving the Requirement that Each Debtor File a List of Creditors and Authorizing Preparation of a Consolidated List of Creditors, in Lieu of Submitting a Formatted Mailing Matrix, (II) Authorizing the Debtors to File a Consolidated List of the Debtors Fifty (50) Largest Unsecured Creditors, (III) Authorizing the Debtors to Redact Certain Personally*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

*Identifiable Information, and (IV) Granting Related Relief* [Docket No. 14] (the “**Creditor Matrix Motion**”);

WHEREAS, on January 27, 2023, the Court entered an order [Docket No. 46] (the “**Interim Creditor Matrix Order**”) authorizing the Debtors to, among other things, redact the names, home addresses, and e-mail addresses of individual creditors, and the addresses and e-mail addresses of all other creditors, listed on the Debtors’ consolidated creditors list or other documents filed with this Court on an interim basis pursuant to sections 107(c) and 105(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 9018 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Local Rule 9018-1;

WHEREAS, on February 8, 2023, the Debtors filed *The Debtors’ Motion Pursuant to 11 U.S.C. §§ 107(b), 107(c), and 105(a) for Entry of an Order Authorizing the Debtors to Redact and File Under Seal Certain Information About the Confidential Parties Listed in the Debtors’ Professional Retention Applications and Schedules* [Docket No. 67] (the “**Redaction Motion**”), which seeks authorization for, among other things, the Debtors to redact the names, addresses, and contact information of individual creditors, the addresses and contact information of the institutional creditors whose addresses are individual home addresses, the names of potential counterparties to mergers and acquisitions, and the names of parties involved in confidential or sealed litigation or regulatory actions or proceedings;

WHEREAS, the Debtors, the Committee, and the U.S. Trustee are engaged in discussions regarding certain matters regarding the Creditor Matrix Motion and the Redaction Motion; and

WHEREAS, on January 27, 2023, this Court entered an order extending the Debtors’ time to file their schedules of assets and liabilities and statements of financial affairs (the “**Schedules**”

**and Statements**”) to March 9, 2023 [Docket No. 42], which was further extended to March 20, 2023 with the consent of the U.S. Trustee [Docket No. 119].

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION AND ORDER, IT IS SO ORDERED as follows:

1. The Debtors shall redact the names, physical addresses, and e-mail addresses of all of the Debtors’ creditors (the “**Confidential Information**”), regardless of whether such creditor is an individual or an institution, in the Schedules and Statements, pending the Court’s ruling on the Committee Motion (as defined herein), the Creditor Matrix Motion, and the Redaction Motion.

2. Not later than March 16, 2023, the Committee may file a motion for entry of an order directing the Debtors to redact Confidential Information in the Schedules and Statements of any creditor that is a lender to the Debtors, regardless of whether such creditor is an individual or an institution, pursuant to section 107 of the Bankruptcy Code (the “**Committee Motion**”).

3. Not later than March 23, 2023 at 4:00 p.m. (Eastern Time), (i) the U.S. Trustee may file a joint objection (the “**UST Objection**”) in response to the Committee Motion, the Creditor Matrix Motion, and the Redaction Motion, and (ii) the Debtors and any other party in interest may file an objection to the Committee Motion.

4. Not later than March 29, 2023 at 4:00 p.m. (Eastern Time), (i) the Committee and the Debtors may each file a reply (if necessary) to the UST Objection and (ii) the Committee may file a reply to any other objections filed to the Committee Motion.

5. The hearing to consider the Committee Motion shall be held on March 30, 2023 at 11:00 a.m. (Eastern Time).

6. The rights of the Parties with respect to the Committee Motion, the Creditor Matrix Motion, and the Redaction Motion, and any objections with respect thereto, are fully reserved.

7. This Stipulation and Order shall not be modified, altered, amended, or vacated without written consent of all Parties.

8. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Stipulation and Order.

**STIPULATED AND AGREED TO THIS 13TH DAY OF MARCH, 2023:**

Dated: March 13, 2023  
New York, New York

By: /s/ J. Christopher Shore

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– and –

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By: /s/ Greg M. Zipes

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*United States Trustee, Region 2*

**SO ORDERED THIS 13th DAY OF MARCH, 2023**

/s/ Sean H. Lane

THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE